

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

DIANA COATES AND
MARGO GREEN

Plaintiffs,

v.

BRAZORIA COUNTY, TEXAS AND
JAMES BLACKSTOCK, INDIVIDUALLY
Defendants.

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CIVIL ACTION NO. 3:10-CV-71

JURY TRIAL DEMANDED

**PROPOSED QUESTIONS FOR JUROR QUESTIONNAIRE
SUBMITTED BY BRAZORIA COUNTY**

In accordance with the Court's February 14, 2012 Order extending time for voir dire, Brazoria County, Texas (the "County") submits the attached proposal for a preliminary informational questionnaire to be submitted as part of the jury selection process. A copy of this proposal has been exchanged with counsel for the other parties. Counsel for Plaintiffs Diana Coates and Margo Green and Counsel for Defendant James Blackstock agree with the attached proposal.

Respectfully submitted,

/s/ Barry Abrams

Barry Abrams
Southern Dist. Bar No. 2138
State Bar No. 00822700

ATTORNEY-IN-CHARGE FOR
DEFENDANT BRAZORIA COUNTY, TEXAS

OF COUNSEL:

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Russell Hardin, Jr.
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Texas Bar No. 24082727
1401 McKinney Street, Suite 2250
Houston, Texas 77010
Tel: (713) 652-9000
Fax: (713) 652-9800

CERTIFICATE OF CONFERENCE

I certify that I have conferred with all counsel of record who state they agree to the submission of this jury questionnaire.

/s/ Susan L. Bickley
Susan L. Bickley

CERTIFICATE OF SERVICE

I certify that all counsel of record who are Filing Users of the Electronic Case Files System of the Southern District of Texas have been served a true and correct copy of the foregoing by electronic submission for filing on February 8, 2013.

Ms. Jacqueline A. Armstrong
Attorney at Law
11111 Katy Freeway, Suite 91
Houston, Texas 77079

Mr. Iain G. Simpson
Simpson, P.C.
P.O. Box 924555
Houston, Texas 77292-4555

Mr. Thomas H. Padgett, Jr.
Attorney at Law
4809 Pine Street
Bellaire, Texas 77401

/s/ Barry Abrams
Barry Abrams

NAME: _____ JUROR NUMBER _____

TO PROSPECTIVE JURORS

This questionnaire is part of the jury selection process. As you complete this questionnaire, please keep in mind the following:

- You must answer *all* of the questions, and you must answer each of those questions *completely*.
- You must answer each question by yourself without the help of anyone else.
- If you need help for any reason, you may ask one of the Court's assistants.
- You must not discuss the questions or your answers with anyone during or after completing the questionnaire, until you are released by the Court.
- If you need more room to answer a question, feel free to continue your answer on the attached blank pages of this questionnaire. Please indicate the number of each question you are answering on the attached blank pages.
- You have been placed under oath and are a potential juror for a pending court case and you must follow the rules you have been given by the Court.
- Please sign in the space provided below the oath.

I do solemnly swear that the answers I have given to the attached questions concerning my qualifications as a juror are true, so help me God.

Signature of Juror

NAME: _____ JUROR NUMBER _____

1. How long have you lived at your current address? _____
Do you live in a: ☐ House ☐ Apartment/Condominium ☐ Mobile Home ☐ Other
(please describe) _____

Do you: ☐ Own your home ☐ Rent your home ☐ Other
(please explain) _____

2. Please tell us about your employment (Check all that apply): ☐ Full time ☐ Part time
☐ Self-employed
☐ Homemaker ☐ Student ☐ Retired ☐ Unemployed ☐ Disabled ☐ Other
(please explain) _____

Where do you work (if unemployed or retired, where ***DID*** you work) and for how long?

What are/were your job duties? _____

Where have you worked in the past and what type of work did you? _____

Have you ever held a job that required you to hire, supervise, evaluate or fire other employees?

☐ Yes ☐ No

If YES, please explain your responsibilities _____

3. How far did you go in school (if college or trade school, where did you attend, what was your major, and what degrees did you earn?)

NAME: _____ JUROR NUMBER _____

4. Current status: ☐ Single ☐ Living with someone _____ yrs ☐ Married _____ yrs
☐ Separated _____ yrs ☐ Divorced _____ yrs ☐ Widowed _____ yrs
☐ Divorced/Widowed & Remarried _____ yrs
5. If living with someone, married, separated, divorced or widowed, please tell us about that person's employment. (**Check all that apply**): ☐ Full time ☐ Part time ☐ Self-employed
☐ Homemaker ☐ Student ☐ Retired ☐ Unemployed ☐ Disabled ☐ Other
(please explain) _____

Where does/did that person work and for how long? _____

What are/were that person's job duties? _____

Where has that person worked in the past and what type of work did he/she do?

How far did that person go in school (if college or trade school, where did that person attend what was his or her major, and what degrees did that person earn?

6. How many children do you have and what are their ages?
Ages of Sons _____ Ages of Daughters _____
7. Do you or anyone close to you have training, experience or special knowledge in any of the following fields:
- ☐ Business administration, accounting, auditing, bookkeeping, etc.
 - ☐ Banking, financial matters, financial planning, budgeting or investments
 - ☐ Contracts (Writing, Reviewing, Negotiating, Enforcing, etc.)
 - ☐ Insurance (Investigating, evaluating or adjusting claims, etc.)
 - ☐ Personnel or human resource management
 - ☐ Law enforcement (e.g., Police, Sheriff, Constable, Adult or Juvenile Probation, Marshall, Investigator)
 - ☐ Appraisal or valuation work (valuing property, businesses, investments, etc.)
 - ☐ Law

NAME: _____ JUROR NUMBER _____

If ANY, please explain: _____

8. Have you or someone close to you ever felt that you were a victim of discrimination or retaliation?

☐ Yes ☐ No If YES, please explain: _____

9. Have you or someone else close to you been accused of discriminating or retaliating against someone else?

☐ Yes ☐ No If YES, please explain: _____

10. Have you or someone close to you ever filed a complaint, grievance, charge or lawsuit in which you claimed that you had been discriminated or retaliated against?

☐ Yes ☐ No If YES, please explain: _____

11. Have you or someone close to you ever been accused of discrimination or retaliation in a complaint, grievance, charge or lawsuit filed by someone else?

☐ Yes ☐ No If YES, please explain: _____

12. Have you or someone close to you ever had a complaint about how you had been treated by a supervisor?

☐ Yes ☐ No If YES, please explain: _____

NAME: _____ JUROR NUMBER _____

13. Have you or someone close to you ever felt that you had been the victim of sexual harassment?

☐ Yes ☐ No If YES, please explain: _____

14. Have you or someone close to you ever been accused of sexual harassment?

☐ Yes ☐ No If YES, please explain: _____

15. Have you or someone else close to you ever worked for a state, county, or local government?

☐ Yes ☐ No If YES, please explain: _____

16. Have you or someone close to you ever been fired from any job?

☐ Yes ☐ No If YES, please explain: _____

17. Who in your household is usually responsible for the family finances (bill paying, bookkeeping, income taxes, etc.)? _____

18. Have you served as a juror before? ☐ Yes ☐ If YES, please answer for each service:

Circle One	Type/Nature of Case	Year	Verdict Reached	Were you the Foreperson?
Civil Criminal			<input type="checkbox"/> Yes <input type="checkbox"/> No	
Civil Criminal			<input type="checkbox"/> Yes <input type="checkbox"/> No	
Civil Criminal			<input type="checkbox"/> Yes <input type="checkbox"/> No	

NAME: _____ JUROR NUMBER _____

If a verdict was **not** reached in any of the cases on which you served, please explain why:

19. Do you, or someone close to you, know anyone involved in the legal field, either personally or professionally?

☐ Yes ☐ No If YES, please explain: _____

20. Have you or someone close to you ever hired an attorney or law firm? ☐ Yes ☐ No If YES, which attorney(s) or law firm(s) and what was the reason?

21. Have you or someone else close to you ever been a party to a lawsuit or other legal action? ☐ Yes ☐ No If YES, please explain: _____

22. Did you or anyone you know ever appear before former Judge James Blackstock for any civil or criminal matter?

☐ Yes ☐ No If YES, what was the disposition of the case? _____

23. Do you know anyone who has spent time in jail? ☐ Yes ☐ No

If YES, where and for what reason? _____

24. Do you know anyone who has gone through the juvenile probation system? ☐ Yes ☐ No

If YES, where and for what reason? _____

NAME: _____ JUROR NUMBER _____

25. Please list any civic, social, professional or religious organizations to which you now belong or have belonged in the past, volunteered your time, donated money, services, materials, etc. and tell us why and how you have been involved with those organizations.

26. Please list all magazines and newspapers that you currently subscribe to or read: _____

27. Are you familiar with any of the following companies, firms or government organizations? Please circle each company or firm with which you are familiar:

Abrams Scott & Bickley, LLP

Galveston County

Law Offices of Jacqueline Armstrong

Galveston County Juvenile Probation
Department

Blank Rome LLP

Law Offices of Anthony Griffin

Brazoria County

Law Offices of Thomas Padgett

Brazoria County Adult Probation
Department

Rusty Hardin & Associates, LLP

Brazoria County District Attorney's
Office

Shellist|Lazarz|Slobin

Brazoria County Juvenile Board

Simpson PC

Brazoria County Juvenile Probation
Department

State Commission on Judicial Conduct

NAME: _____ JUROR NUMBER _____

28. Are you familiar with any of the following individuals? Please circle each individual with whom you are familiar:

Barry Abrams	Linda Hansche	Melanie Oldham
Jacqueline Armstrong	Judge Ben Harden	Thomas Padgett
Rick Avery	Rusty Hardin	Delpha Price
Ashley Baker	Judge Marc Holder	Judge Lori Rickert
Susan Bickley	Joyce Hudman	Jeremy Robin
Tonya Bittner	Judge Randall Hufstetler	Judge Patrick Sebesta
James Blackstock	Larry Johnson	Martin Shellist
Valerie Blackstock	Mikk Kalina	Iain Simpson
Will Blackstock	Judge Joe King	Becky Sirmans
Charles Bostrom	Kyle Knight	Vicki Spriggs
Lynnete Boudreaux	Brenda Lege	Christie Strawn
Jennifer Brevorka	Nora Lennon	Kyle Teat
Clay Caldwell	Marita Lewis	Lenette Terry
Victoria Cisneros-Gardzina	Alice Logsdon	Ken Walters
Diana Coates	Elsie Maggert	Joe Ware
James Rodney Coates	Judge Robert May	Judge Jeremy Warren
Janet Cox	Jim McCoy	James Williams
Allison Davis	Jeffrey McIlhaney	Jim Wiginton
Judge Ed Denman	Shawn Meuth	Stephanie Wollam
Charles Finch	Judge Jerri Mills	Kathy Woods
Michael Alan Fuller	Gladys Mitchell	Jeri Yenne
Margo Green	Brent Norris	
Anthony Griffin	Debbie Norris	

NAME: _____ JUROR NUMBER _____

SPACE FOR ADDITIONAL ANSWERS

NAME: _____ JUROR NUMBER _____

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NAME: _____ JUROR NUMBER _____

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